

January 16, 2008

Mr. Michael Berta, Superintendent  
Portage Township School Corporation #6550  
6240 U.S. Highway 6  
Portage, Indiana 46368

Dear Mr. Berta:

On December 3, 2007, the Indiana Department of Education's (IDOE) monitoring team commenced an on-site monitoring review of the Portage Township School Corporation's administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Portage Township School Corporation is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, Portage Township School Corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank you and your staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Portage Township School Corporation to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director  
Division of Compensatory Education

cc: Mary Kay Stanton, Title I Program Administrator, Portage Township School Corporation #6550

Linda Miller, Assistant Superintendent of Community Relations  
and Special Populations, IDOE

**Indiana Department of Education  
Title I, Part A Monitoring**

**District: Portage Township School Corporation**

**Monitoring Date:** December 3, 2007

**Monitoring Team:** Lee Ann Kwiatkowski, Brenda Martz, Lenée' Reedus, Linda Ricketts, Laura Cope, and Sarah Pies

**Background Information**

The Indiana Department of Education (IDOE) commenced on-site monitoring of the Portage Township School Corporation on December 3, 2007. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
4) Compliance with district improvement requirements	NCLB §1116(c)
5) Compliance with schoolwide program requirements	NCLB §1114
6) Compliance with targeted assistance program requirements	NCLB §1115
7) Compliance with school ranking and serving requirements	NCLB §1113
8) Compliance with comparability requirement	NCLB §1120A
9) Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521
10) Compliance with equitable services to private school students requirements	NCLB §1120

11) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
12) Compliance with supplement, not supplant requirements	NCLB §1120A
13) Compliance with financial management systems requirements	EDGAR §80.20 EDGAR §80.36
14) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
15) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
16) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87
17) Compliance with Neglected Institutes	NCLB §1401
18) Compliance with Delinquent Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from Portage Township School Corporation at their central office. In addition, IDOE visited Paul Saylor Elementary and Central Elementary where interviews were conducted with the principal and the Title I staff.

IDOE also reviewed Portage Township School Corporation's documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

## **Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals**

### **Background**

IDOE interviewed the Title I Program Administrator and building principals. In addition, IDOE reviewed personnel documents and notices to parents.

*Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.*

### **Areas of Compliance**

**Professional Qualification Requirements for Paraprofessionals:** Portage Township School Corporation was able to provide evidence that all instructional paraprofessionals meet the highly qualified requirements. Non-certified staff files included ParaPro assessment information, college transcripts, or evidence of an earned Bachelor’s degree.

**Parents’ Right to Know: Teacher Qualification:** Portage Township School Corporation did ensure that all parents of students in Title I served schools received the Parents’ Right to Know notification explaining that they could request information on the qualifications of their children’s instructors. The required information was included in the fall edition of the corporation newsletter, Connect, and distributed to all families in the corporation. Proof of mailing was provided. The newsletter was mailed directly from the central office.

**Recommendation:** IDOE suggests that Portage Township School Corporation keep documentation of the funding source used for mailing the corporation newsletter. Title I may not fund this mailing since it is distributed to all families in the district and not just Title I families.

**Parents’ Right to Know: Non-Highly Qualified Teacher:** Portage Township School Corporation did ensure that parents would be notified of the Parents’ Right to Know if their child was assigned to or taught by a teacher in a core academic subject who is not highly qualified for 4 or more consecutive weeks, if needed.

**Principal Attestation:** Portage Township School Corporation ensures that the principal of every school receiving Title I funds has attested annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1**

**Professional Qualification Requirements:** Portage Township School Corporation could not demonstrate that teachers currently meet or will meet the highly qualified teacher requirements. Evidence could not be provided to document that all veteran teachers have completed the High Objective Uniform State Standard of Evaluation (HOUSSE).

**Required Action:** Portage Township School Corporation must provide a statement of assurance that all core academic subject teachers are or will become highly qualified. The appropriate documentation (e.g., staff roster, teaching licenses and either Praxis or HOUSSE documentation) to support the highly qualified status must be kept centrally located within the district.

Information regarding Highly Qualified teachers and HOUSSE documentation can be found at the following website:

<http://www.doe.state.in.us/hqt/welcome.html>

**5 Percent Set-Aside:** Portage Township School Corporation did not reserve 5 percent of its allocation to support assisting teachers in reaching the professional qualification requirements.

**Required Action:** Portage Township School Corporation must ensure all teachers are highly qualified. Portage Township School Corporation must help teachers complete HOUSSE documentation to determine if all staff are highly qualified. If any of the teachers are not highly qualified, an amendment must be completed to set-aside 5 percent to help teachers in Title I served schools become highly qualified.

## **Monitoring Topic 2: Compliance with Parental Involvement Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator, building principals, and Title I teachers regarding parent involvement requirements. In addition, the IDOE collected letters, notices, and other documents that were reviewed prior to and during the on-site.

*Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB. (See Attachment B)*

## **Areas of Compliance**

**Annual Meeting:** Portage Township School Corporation demonstrated that all Title I schools held an annual meeting for Title I parents. A letter announcing the meetings was provided to the IDOE. The meetings were offered during the school day and in the evening to accommodate parent schedules.

**Recommendation:** IDOE suggests Portage Township School Corporation keep parent sign-in sheets and agendas of the annual meetings as additional evidence.

**Building Schools' and Parents' Capacity for Strong Parental Involvement:** Portage Township School Corporation showed evidence of building capacity with its Title I parents. "Bingo for Books" and translators at parent meetings encourage parental attendance.

**Recommendation:** IDOE suggests that Portage Township School Corporation strengthen their capacity for building parent involvement by offering additional opportunities for parents to become involved in their child's achievement. "The LEA (Local Educational Agency) and schools receiving assistance under Title I, Part A must ensure effective involvement of parents and support a partnership among the school, the parents, and the community to improve student academic achievement through training, information, and coordination activities." Section 1118(e), ESEA

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2**

**LEA Parent Involvement Policy:** Portage Township School Corporation has a district parental involvement policy; however, it did not include all of the statutory components. The policy was created and revised jointly with Title I parents by site-based teams, but no evidence was kept to document the revision process. Evidence was not provided to show that the policy was distributed to parents of participating Title I students. (See Attachment Topic 2-A)

**Required Action:** Portage Township School Corporation must ensure that a district parental involvement policy is revised for the 2008-2009 school year with parents and contains all statutory components. The LEA Parental Involvement Policy, along with sign-in sheets from staff and parents that revised this plan, must be submitted to the IDOE. The policy must thereafter be updated on an annual basis.

**Required Action:** Portage Township School Corporation must distribute the policy at the beginning of the 2008-2009 school year to the parents of all

participating Title I students and provide documentation of distribution to the IDOE.

**School Parental Involvement Policy:** Portage Township School Corporation does not have a school parent involvement policy that contains the required statutory components. Although Paul Saylor Elementary School and Central Elementary School have parental involvement policies, a thorough review revealed that essential components are missing. The schools were unable to provide evidence that the parent involvement policies were developed in meaningful consultation with Title I parents and were distributed to the parents of all participating Title I students.  
(See Attachment Topic 2-B)

**Required Action:** Portage Township School Corporation must submit to the IDOE revised school parental involvement policies for Paul Saylor Elementary School and Central Elementary School to the IDOE. Evidence must show that the policies were revised with meaningful consultation with Title I parents.

**Required Action:** Portage Township School Corporation must submit evidence to the IDOE that shows the policies were distributed to all Title I parents (e.g. mailing receipt) at the beginning of the 2008-2009 school year.

In addition, it is the program administrator's responsibility to ensure that the parental involvement policies contain the necessary components as stated in Sec. 1118 in order to be in compliance with NCLB requirements. Parental involvement policies must be updated with parents annually.

**School-Parent Compact:** Portage Township School Corporation was able to provide evidence that Paul Saylor Elementary School and Central Elementary School have school-parent compacts and that 100% of the students and parents have received them; however, the compacts do not contain all of the statutory components nor were they developed and revised with meaningful consultation with Title I parents.  
(See Attachment Topic 2-C)

**Required Action:** Portage Township School Corporation must submit revised school-parent compacts for the 2008-2009 school year for review from Paul Saylor Elementary School and Central Elementary School.

**Required Action:** Portage Township School Corporation must provide evidence to the IDOE showing that the school-parent compacts were revised with meaningful consultation with Title I parents and are unique to each school.

**Reviews the Effectiveness of Parent Involvement Activities:** Portage Township School Corporation could not provide evidence that the LEA or school reviews the effectiveness of school parent involvement activities.



**Required Action:** Portage Township School Corporation must ensure that parent involvement activities are reviewed for their effectiveness. Examples of effective ways to evaluate parent involvement activities could include teacher and parent surveys that yield reliable feedback that will guide action, pre and post documentation of knowledge (K-W-L), and videotapes of parent activities with follow-up discussion and documentation of that discussion.

**Required Action:** Portage Township School Corporation must submit a statement of assurance that written records of meetings, that are held to discuss the effectiveness of parental involvement activities, will be kept. Agendas and sign-in sheets must be kept for documentation.

**Parent Information Resource Center:** Portage Township School Corporation has not made parents aware of the Parent Information Resource Center (PIRC) in Indiana.

**Required Action:** Portage Township School Corporation must immediately notify parents of the Parent Information Resource Center (PIRC) in Indiana. Evidence that parents have been notified of the Indiana Center for Family, School and Community Partnerships must be provided to the IDOE.

For additional information, please refer to the following website:  
<http://www.fscp.org/>

### **Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school choice and Supplemental Educational Services (SES).**

#### **Background**

IDOE interviewed the Title I Program Administrator, the building principals, and Title I teachers to discuss school improvement issues.

*Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.*

#### **Areas of Compliance**

**Notification to Parents:** Portage Township School Corporation was able to provide proof of mailing that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school. The Public School Choice and Supplemental Educational Services (SES) programs are communicated in the letter in a language that is easy for parents to understand and make choices.

**Implementation of School Improvement Plan:** Portage Township School Corporation could demonstrate that the district monitors the implementation of the school improvement plan at Paul Saylor Elementary School. The superintendent meets quarterly with principals as a “Leadership Team” where the plan is discussed. The program administrator meets with the Title I teacher and principal to monitor the implementation of the school improvement plan.

**Recommendation:** IDOE recommends that the Program Administrator conduct and document “walk throughs” to observe the implementation of the school improvement plan at Paul Saylor Elementary School.

**Peer Review of School Improvement Plan:** Portage Township School Corporation provided evidence of a peer review process for Paul Saylor Elementary School’s improvement plan.

**Recommendation:** IDOE suggests a more comprehensive review as stated in Public Law Section 1116(b)(3)(E): Peer reviewers must consider a proposed plan for school improvement within 45 days of its submission, through a process established by the LEA. The LEA should involve, as peer reviewers, teachers and administrators from schools or districts similar to the one in improvement, but significantly more successful in meeting the learning needs of their students. Staff with demonstrated effectiveness and recognized expertise in school improvement will be able to evaluate the plan’s quality and the likelihood of its successful implementation, and make suggestions for revisions.

**Tracking of Choice Transfers:** Portage Township School Corporation tracks student participation in Choice. However, the tracking was kept on loose leaf paper that was mixed in with other documents in a binder. It was difficult to determine how many students participated and which schools they attended. No student that requested a transfer was denied.

**Recommendation:** Portage Township School Corporation needs a more efficient and sophisticated method of tracking student transfers. Creating a computerized spreadsheet to document participation in consecutive years would be a more effective method than using paper and pencil.

**Eligibility Requirements for Supplemental Educational Services:** Portage Township School Corporation has a process in place to ensure each student meets eligibility requirements to receive SES. Portage Township School Corporation ensures that each student receives either free or reduced lunch before providing these services.

**Tracking of Supplemental Educational Services:** In 2006-2007 Portage Township School Corporation provided a paper and pencil document on which the district tracks SES enrollment numbers and the amount of funds being expended for each SES

student to ensure that the district is not paying for tutoring costs beyond the district's Per Pupil Expenditure amount.

**Recommendation:** IDOE recommends that Portage Township School Corporation develop a more sophisticated and efficient SES tracking system to eliminate the potential for human error.

**Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3**

(See Attachment Topic 3)

**School Improvement Plan:** Portage Township School Corporation was able to demonstrate that Paul Saylor Elementary School has developed a school improvement plan that contains all of the statutory components; however, no evidence could be provided to document that it was developed and revised in consultation with parents, school staff, and the LEA, or that it was revised within 3 months of being identified.

**Required Action:** Portage Township School Corporation must provide a statement of assurance that school staff, parents, and outside experts will participate in the annual revision of the plan. Evidence of meetings could include notices to parents, agendas, and sign-in sheets.

**Corrective Action:** Portage Township School Corporation could not provide sufficient evidence of substantial corrective action for Paul Saylor Elementary School. An outside consultant, after school tutoring for a small number of students, and a new reading series were reported as the corrective action chosen for Paul Saylor Elementary School. However, no evidence was provided to document that the consultant advises the school on revising and implementing the school improvement plan on an ongoing basis, and the after school tutoring was not designed to increase the likelihood that **all** of the subgroups will meet the state's proficient level of achievement on the state assessment by extending the school day for all students. Adopting a new reading series is not a new curriculum.

**Required Action:** Portage Township School Corporation must submit to the IDOE a detailed description of the corrective action taken for Paul Saylor Elementary School.

In addition, Portage Township School Corporation must review the scope of corrective actions as found in Section 1116 of NCLB Public Law. NCLB describes six potential actions and at least one of the following must be taken:

- Institute and fully implement a new curriculum, including providing appropriate professional development for all relevant staff, that is based on scientifically-based research and which offers substantial promise of improving educational achievement for low-achieving students and enabling the school to make Adequate Yearly Progress;

- Significantly decrease management authority at the school level;
- Appoint one or more outside experts to advise the school on revising and implementing its school plan;
- Extend the school year or school day for that school; or
- Restructure the internal organizational structure of the school.

Portage Township School Corporation should refer to the Non-Regulatory Guidance on School Improvement for additional information about corrective action.

<http://www.ed.gov/policy/elsec/guid/schoolimprovementguid.doc>

**Supplemental Educational Services:** Portage Township School Corporation could provide evidence that notification was mailed to parents of eligible children regarding the availability of SES; however, services had not begun at the time of the on-site visit. Only two students have requested SES. Teachers are not aware of which children in their classrooms are eligible for SES.

**Required Action:** Portage Township School Corporation must develop and submit a detailed summary of the method it will use to better educate school staff about the availability of SES. The Portage Township School Corporation should enlist schools in their campaign to reach parents. For example, the LEA could use back-to-school nights as forums for teachers to explain SES to parents and offer them advice about enrolling their children. As part of this effort, Portage Township School Corporation should educate teachers and principals about the provisions to be sure that they can effectively and objectively assist parents in making their selections.

In addition, Section 9 of the Richard B. Russell National School Lunch Act (NSLA), taken from the Supplemental Educational Services Non-Regulatory Guidance, establishes requirements and limitations regarding the release of information about children certified for free and reduced price meals provided under the National School Lunch program. The NSLA allows school officials responsible for determining free and reduced price meal eligibility to disclose aggregate information about children certified for free and reduced price schools meals. Additionally, the statute permits determining officials to disclose the names of individual children certified for free and reduced price school meals and the children's eligibility status to persons directly connected with the administration or enforcement of a Federal or State education program.

Because Title I is a Federal education program, determining officials may disclose a child's eligibility status to persons directly connected with, and who have a need to know, a child's free and reduced price meal eligibility in order to administer the Title I SES requirements. School officials, prior to disclosing individual information on the School Lunch Program eligibility of individual students, should enter into a memorandum of understanding or other agreement

to which all involved parties would adhere. This agreement should specify the individuals who would have access to the information, how the information would be protected from unauthorized uses and third-party disclosures, as well as include a statement of the penalties for misuse.

In addition, Portage Township School Corporation should refer to the Non-Regulatory Guidance on Supplemental Educational Services published by the United States Department of Education for additional information about SES.  
<http://www.ed.gov/policy/elsec/guid/suppsvcsguid.doc>

**Recommendation:** Portage Township School Corporation should consider multiple avenues for providing general information about SES, including newspapers, Internet, radio, TV ads, and notices at venues that parents may frequent, such as movie theaters, shopping malls, beauty parlors, and places of worship.

**Required Action:** Portage Township School Corporation must send an additional recruitment notice with the list of SES providers and their descriptions to parents encouraging them to enroll their children in SES.

In addition, Portage Township School Corporation should refer to the SES website for information that includes sample fliers/notices and additional parent outreach options.  
<http://mustang.doe.state.in.us/dg/ses/welcome.html>

#### **Monitoring Topic 4: Compliance with District Improvement Requirements**

Not Applicable

#### **Monitoring Topic 5: Compliance with Schoolwide Program Requirements**

Not Applicable

#### **Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements**

##### **Background**

IDOE interviewed the Title I Program Administrator, building principals. And Title I Teachers regarding targeted assistance school program requirements.

*Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible*

*children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.*

### **Areas of Compliance**

**Student Selection:** Portage Township School Corporation provided evidence that the selection of students was based on multiple, educationally related, objective, uniformly applied criteria given to all students at each served grade level at Paul Saylor Elementary School and Center Elementary School. A rank order listing was available for each grade served with all students identified.

**Progress Monitoring:** Paul Saylor Elementary School and Central Elementary School monitor the progress of participating students on an ongoing basis through DIBELS progress monitoring every 2-3 weeks and benchmark assessments 3 times each year.

**Targeted Assistance Staff:** Title I personnel at Paul Saylor Elementary School and Center Elementary School have schedules of fixed daily responsibilities and methods and instructional strategies are based on scientifically based research. DIBELS intervention groups meet daily for one half an hour with 4-5 most at risk students in kindergarten through second grade.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6**

None

## **Monitoring Topic 7: Compliance with School Ranking and Serving Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements.

*Statutory Requirement: The ranking and serving requirements are contained in Section 1113.*

### **Areas of Compliance**

**Ranking and Serving:** Portage Township School Corporation demonstrated compliance with the statutory requirements for ranking and serving.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7**

None

### **Monitoring Topic 8: Compliance with Comparability Requirement**

#### **Background**

IDOE interviewed the Title I Program Administrator regarding the Title I comparability requirement. The Comparability Report for 2007-2008 was reviewed.

*Statutory Requirement: The comparability requirement is contained in Section 1120A.*

#### **Areas of Compliance**

**Comparability:** Portage Township School Corporation has demonstrated compliance with the comparability requirement based upon review of the revised 2007 comparability report, as well as working papers that support figures submitted in the report.

**Recommendation:** Portage Township Schools must refer to the guidance on comparability when counting the full time equivalent of the non-Title I personnel.

Refer to the following website for additional guidance:

[http://www.doe.state.in.us/TitleI/comparability\\_info.html](http://www.doe.state.in.us/TitleI/comparability_info.html)

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8**

None

### **Monitoring Topic 9: Compliance with Maintenance of Effort**

#### **Background**

The Indiana Department of Education conducts a yearly review of maintenance of effort for all Title I schools.

*Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.*

#### **Areas of Compliance**

Portage Township School Corporation is in compliance with the maintenance of effort requirement.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9**

None

## **Monitoring Topic 10: Compliance with Equitable Services to Private School Students Requirements**

### **Background**

IDOE interviewed the Title I Program Administrator regarding compliance with nonpublic requirements.

*Statutory Requirements: The equitable services requirements are contained in Section 1120.*

### **Areas of Compliance**

**Equitable Services:** Portage Township School Corporation provided evidence of policies and procedures in place to ensure “equitable” services to children attending non-public schools.

**Consultation with Non-Public Officials:** Portage Township School Corporation was able to provide evidence that consultation between the district and nonpublic schools begins in the spring as the Title I grant for the following year is being developed.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10**

(See Attachment Topic 10)

**Nonpublic Student Eligibility:** Portage Township School Corporation could not provide documentation that participating nonpublic school children are residents of an eligible school attendance area because addresses of the students that attended the nonpublic school were not provided to the LEA.

**Required Action:** Portage Township must request addresses from the nonpublic school to verify that students receiving services are from an eligible attendance area. Documentation that addresses were used to verify that students receiving service are from an eligible attendance area must be submitted to the IDOE.

**Student Selection:** Portage Township School Corporation provided evidence that appropriate criteria were used to identify eligible students for Title I services; however, a student ranking system based on the criteria was not used to determine the most at-risk.



**Required Action:** Portage Township School Corporation must provide evidence to the IDOE that students from eligible school attendance areas are ranked according to multiple criteria to determine which students receive Title I services.

**Nonpublic Personnel:** Portage Township School Corporation is paying two teachers for 2 hours of direct instruction each day, but they are only providing an hour and a half of tutoring with a half hour of planning at the nonpublic school. The LEA is paying a paraprofessional to provide direct instruction, but the paraprofessional spends part of her time supervising students during snack time.

**Required Action:** Portage Township School Corporation must submit a statement of assurance that the personnel employed to work at the nonpublic school spends 100% of their time providing direct instruction to eligible Title I students.

**Program Evaluation:** Portage Township School Corporation does not meet requirements regarding the Title I program for private school students. The LEA has not determined, in consultation with private school officials, how the Title I program will be assessed, what the agreed upon standards are, and how the annual progress will be measured.

**Required Action:** Portage Township School Corporation must consult with appropriate officials from the private school during the design and development of the LEA's program for eligible private school students on issues such as how the LEA will assess the services to eligible private school students and how the LEA will use the results of that assessment to improve Title I services. As part of the consultation process, a determination as to what standards and assessments will be used to measure the annual progress must be decided. The LEA must provide the IDOE with a detailed description of the procedures it will use to ensure the correct implementation of the requirement.

## **Monitoring Topic 11: Compliance with Statutory Set-aside**

### **Background**

IDOE interviewed the Title I Program Administrator and the Assistant Director of Finance regarding the Title I statutory set-aside requirements.

*Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).*

## **Areas of Compliance**

**Homeless Students:** Portage Township School Corporation set aside \$1,000.00 for homeless students in non-Title I schools. The district relies on home school advisors and counselors to identify those students that are homeless. Funds were expended on a graduation cap and gown.

**20 Percent Set-aside/Choice:** Portage Township School Corporation set aside \$25,326.90 for transportation and Supplemental Educational Services. No Title I dollars for Choice transportation were expended since the Portage Township School Corporation covered this cost. The district expended \$8,612.00 for Supplemental Educational Services with Kumon Math and Reading Center in 2006-2007.

**1 Percent Parental Involvement:** Portage Township School Corporation provided evidence that one percent of the allocation for parental involvement was reserved and expended.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11**

**10 Percent Professional Development:** Paul Saylor was required to set-aside \$25,774.00 for school improvement. The district expended \$7,453.91 on travel and supplies for professional development. Additionally, the district could not show evidence in the appropriation distribution report that additional funds were used to support Paul Saylor Elementary with school improvement.

**Required Action:** Portage Township School Corporation must provide a statement of assurance to the IDOE that the mandatory 10 percent budgeted at Paul Saylor Elementary School for professional development will be expended by September 30, 2008.

## **Monitoring Topic 12: Compliance with Supplement, not Supplant**

### **Background**

IDOE interviewed the Title I Program Administrator and the principals regarding the Title I supplement, not supplant requirements.

*Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.*

### **Area of Compliance**

**Program Expenditures:** Title I programs in grades first through second supplement, not supplant non-Federal sources of funds.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12**

(See Attachment Topic 12)

**Program Expenditures:** Portage Township School Corporation is using Title I, Part A funds to pay the full salary of kindergarten teachers in Aylesworth Elementary, Central Elementary, Paul Saylor Elementary, Crisman Elementary, and South Haven Elementary. Records of targeted assistance programs indicate that expenditures used to meet the statutory requirements are supplanting non-federal resources.

**Required Action:** Indiana state law requires districts to offer a half day session to all kindergarten students. Title I can only supplement the second half of the day. Portage Township School Corporation must provide morning kindergarten instruction through state and local general fund dollars to all students – including Title I-eligible students by the next grading period or third trimester of the 2007-2008 school year. Students identified as most in academic need are then served in the afternoon through Title I funds by appropriately licensed teachers. The teacher may be the same individual who teaches kindergarten in the corporation's regular kindergarten program, with Title I funding the second half of the teacher's day and salary. This model meets the federal supplement, not supplant test since the Title I-eligible students are receiving services above and beyond those entitled to and provided by the corporation to all students.

For additional guidance on supplement, not supplant, refer to the following website:

[http://www.doe.state.in.us/TitleI/pdf/full-dayK\\_supplement\\_not\\_supplant.pdf](http://www.doe.state.in.us/TitleI/pdf/full-dayK_supplement_not_supplant.pdf)

**LEA Guidance on Supplement, not Supplant:** Portage Township School Corporation could not provide evidence that it provides written guidance to schools on the supplement, not supplant rule.

**Required Action:** Portage Township School Corporation must provide evidence that it has given guidance to schools on the supplement, not supplant rule.

## **Monitoring Topic 13: Compliance with Financial Management Systems Requirements**

### **Background**

IDOE interviewed the Title I Program Coordinator and the Assistant Director of Finance regarding Portage Township School Corporation's financial management system.

*Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).*

## **Areas of Compliance**

**Purchase Orders and Invoices:** Portage Township School Corporation provided evidence that the Title I Program Administrator must approve and sign all purchase orders and invoices for the program. The treasurer does not pay for any Title I activity unless it is an approvable expenditure in the application.

**Expenditures are Reasonable, Allocable, and Necessary:** Portage Township School Corporation could provide evidence that Title I expenditures met the reasonable, allocable, and necessary requirements.

## **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13**

(See Attachment Topic 13)

**Internal Control:** IDOE found multiple instances where Portage Township School Corporation lacked internal control. Documentation of expenditures shows that some items are coded incorrectly on expenditure reports. School improvement expenditures for salaries at Paul Saylor Elementary School were coded to the district. There were no dates listed on the SES invoices and no attendance roster to verify payment for participating students.

**Required Action:** Portage Township School Corporation must put measures in place for a better system of internal control. A written description of the system must be submitted to the IDOE.

**Contracted Services:** Portage Township School Corporation could not provide evidence that measures are in place to ensure the contracted service provider is working the amount of time for which she is paid. The Title I Program Administrator is under contract for 2006-2007 for \$41,963.00 and currently for 2007-2008 for \$42,802.00. The contract does not list the description of dates and hours when services will be performed.

**Required Action:** Portage Township School Corporation must provide evidence that the Program Administrator is working the amount of time for which she is being paid. Invoices must be submitted listing a description of services performed as well as a description of the dates and hours services were performed before payment is issued.

**Supplemental Educational Services:** Portage Township School Corporation did not compare invoices with the student attendance to ensure that the number of sessions being billed matched the attendance submitted from the SES provider.

**Required Action:** Portage Township School Corporation must request attendance sheets along with invoices to verify that the number of sessions being billed is accurate.

## **Monitoring Topic 14 Compliance with compensation for personnel services requirements**

### **Background**

IDOE interviewed the Title I Program Administrator as well as the principals of two schools in regard to the compensation for personnel services requirements.

*Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.*

### **Areas of Compliance:**

**Compensation for Personnel Services Requirements:** Portage Township School Corporation was able to provide evidence that personnel in “split funded: positions maintain Program Activity Reports (PAR)/Time and Effort logs. Personnel who have worked 100% of their time in Title I, Part A have completed Semi-Annual Certifications.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14**

None.

## **Monitoring Topic 15: Compliance with complaint procedures**

### **Background**

IDOE interviewed the Title I Program Administrator, the building principals, and the assistant treasurer regarding the complaint process.

### **Areas of Compliance**

**Complaint Process:** Portage Township School Corporation was able to demonstrate that the district has a complaint procedure. No complaints have been filed.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15**

None

## **Monitoring Topic 16: Compliance with equipment requirements – OMB A-87 and EDGAR 80.36**

### **Background**

IDOE interviewed the Title I Program Administrator and two school principals regarding equipment acquired with Title I, Part A funds.

*Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).*

### **Strength**

**Equipment and Technology Inventory:** Portage Township School Corporation provided inventory lists that meet the requirements of EDGAR 80.32. Portage Township School Corporation has worked throughout this past year to ensure that all equipment and technology is properly identified on the inventory list.

### **Areas of Compliance**

**Disposition of Equipment:** Portage Township School Corporation showed evidence of a disposition policy.

**Equipment Labeling:** Portage Township School Corporation showed evidence that equipment purchased with Title I funds was properly labeled and identified.

### **Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16**

None

## **Monitoring Topic 17: Compliance with Neglected Institutions: Funded through Title I, Part A**

Not Applicable

## **Monitoring Topic 18: Compliance with Delinquent Institutions: Funded through Title I, Part D, Subpart 2**

Not Applicable

## Attachment Topic 2

### SEC. 1118. PARENTAL INVOLVEMENT.

#### (a) LOCAL EDUCATIONAL AGENCY POLICY-

(1) IN GENERAL- A local educational agency may receive funds under this part only if such agency implements programs, activities, and procedures for the involvement of parents in programs assisted under this part consistent with this section. Such programs, activities, and procedures shall be planned and implemented with meaningful consultation with parents of participating children.

(2) WRITTEN POLICY- Each local educational agency that receives funds under this part shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall be incorporated into the local educational agency's plan developed under section 1112, establish the agency's expectations for parent involvement, and describe how the agency will —

(A) involve parents in the joint development of the plan under section 1112, and the process of school review and improvement under section 1116;

(B) provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance;

(C) build the schools' and parents' capacity for strong parental involvement as described in subsection (e);

(D) coordinate and integrate parental involvement strategies under this part with parental involvement strategies under other programs, such as the Head Start program, Reading First program, Early Reading First program, Even Start program, Parents as Teachers program, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs;

(E) conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities authorized by this section (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background), and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies described in this section; and

(F) involve parents in the activities of the schools served under this part.

#### (3) RESERVATION-

(A) IN GENERAL- Each local educational agency shall reserve not less than 1 percent of such agency's allocation under subpart 2 of this part to carry out this section, including promoting family literacy and parenting skills, except that this paragraph shall not apply if 1 percent of such agency's allocation under subpart 2 of this part for the fiscal year for which the determination is made is \$5,000 or less.

(B) PARENTAL INPUT- Parents of children receiving services under this part shall be involved in the decisions regarding how funds reserved under subparagraph (A) are allotted for parental involvement activities.

(C) DISTRIBUTION OF FUNDS- Not less than 95 percent of the funds reserved under subparagraph (A) shall be distributed to schools served under this part.

#### (b) SCHOOL PARENTAL INVOLVEMENT POLICY-

(1) IN GENERAL- Each school served under this part shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the requirements of subsections (c) through (f). Parents shall be notified of the policy in an

understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. Such policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school.

(2) SPECIAL RULE- If the school has a parental involvement policy that applies to all parents, such school may amend that policy, if necessary, to meet the requirements of this subsection.

(3) AMENDMENT- If the local educational agency involved has a school district-level parental involvement policy that applies to all parents, such agency may amend that policy, if necessary, to meet the requirements of this subsection.

(4) PARENTAL COMMENTS- If the plan under section 1112 is not satisfactory to the parents of participating children, the local educational agency shall submit any parent comments with such plan when such local educational agency submits the plan to the State.

(c) POLICY INVOLVEMENT- Each school served under this part shall —

(1) convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under this part and to explain the requirements of this part, and the right of the parents to be involved;

(2) offer a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement;

(3) involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy and the joint development of the schoolwide program plan under section 1114(b)(2), except that if a school has in place a process for involving parents in the joint planning and design of the school's programs, the school may use that process, if such process includes an adequate representation of parents of participating children;

(4) provide parents of participating children —

(A) timely information about programs under this part;

(B) a description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet; and

(C) if requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible; and

(5) if the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the local educational agency.

(d) SHARED RESPONSIBILITIES FOR HIGH STUDENT ACADEMIC ACHIEVEMENT- As a component of the school-level parental involvement policy developed under subsection (b), each school served under this part shall jointly develop with parents for all children served under this part a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall —

(1) describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and

(2) address the importance of communication between teachers and parents on an ongoing basis through, at a minimum —



- (A) parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates the individual child's achievement;
- (B) frequent reports to parents on their children's progress; and
- (C) reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities.

(e) **BUILDING CAPACITY FOR INVOLVEMENT**- To ensure effective involvement of parents and to support a partnership among the school involved, parents, and the community to improve student academic achievement, each school and local educational agency assisted under this part —

- (1) shall provide assistance to parents of children served by the school or local educational agency, as appropriate, in understanding such topics as the State's academic content standards and State student academic achievement standards, State and local academic assessments, the requirements of this part, and how to monitor a child's progress and work with educators to improve the achievement of their children;
- (2) shall provide materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate, to foster parental involvement;
- (3) shall educate teachers, pupil services personnel, principals, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school;
- (4) shall, to the extent feasible and appropriate, coordinate and integrate parent involvement programs and activities with Head Start, Reading First, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children;
- (5) shall ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand;
- (6) may involve parents in the development of training for teachers, principals, and other educators to improve the effectiveness of such training;
- (7) may provide necessary literacy training from funds received under this part if the local educational agency has exhausted all other reasonably available sources of funding for such training;
- (8) may pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and child care costs, to enable parents to participate in school-related meetings and training sessions;
- (9) may train parents to enhance the involvement of other parents;
- (10) may arrange school meetings at a variety of times, or conduct in-home conferences between teachers or other educators, who work directly with participating children, with parents who are unable to attend such conferences at school, in order to maximize parental involvement and participation;
- (11) may adopt and implement model approaches to improving parental involvement;
- (12) may establish a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section;
- (13) may develop appropriate roles for community-based organizations and businesses in parent involvement activities; and
- (14) shall provide such other reasonable support for parental involvement activities under this section as parents may request.

(f) **ACCESSIBILITY**— In carrying out the parental involvement requirements of this part, local educational agencies and schools, to the extent practicable, shall provide full opportunities for the participation of parents with limited English proficiency, parents with disabilities, and parents of migratory children, including providing information and school reports required under section 1111 in a format and, to the extent practicable, in a language such parents understand.

(g) INFORMATION FROM PARENTAL INFORMATION AND RESOURCE CENTERS- In a State where a parental information and resource center is established to provide training, information, and support to parents and individuals who work with local parents, local educational agencies, and schools receiving assistance under this part, each local educational agency or school that receives assistance under this part and is located in the State shall assist parents and parental organizations by informing such parents and organizations of the existence and purpose of such centers.

(h) REVIEW- The State educational agency shall review the local educational agency's parental involvement policies and practices to determine if the policies and practices meet the requirements of this section.

## Attachment A

**Local Educational Agency (LEA) Parental Involvement Policy:** Sec. 1118 (a) (2) Each LEA shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall describe how the agency will:

Parental Involvement Policy Requirements: Portage Township School Corporation		Found on Page #
1. Involve parents in the joint development of the plan and the process of school review and improvement		No
2. Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance		No
3. Build the schools' and parents' capacity for strong parental involvement by <ul style="list-style-type: none"><li><input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li><li><input type="checkbox"/> Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement</li><li><input type="checkbox"/> Coordination and integrating parental involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</li><li><input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school</li><li><input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</li><li><input type="checkbox"/> Other reasonable support for parental involvement activities under section 1118 as parents may request</li></ul>	1. No  2. No  3. No  4. No  5. No  6. No	
4. Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs		No
5. Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies		No
6. Involve parents in the activities of the schools served under Title I		Yes

## Attachment B

### School Parent Involvement Policy Checklist

**School Parental Involvement Policy:** Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy <b>Paul Saylor Elementary</b>	Found on Page #
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	Yes
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	No
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	Yes
4. Provide parents with: <ul style="list-style-type: none"> <li><input type="checkbox"/> Provide timely information about Title I programs</li> <li><input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet</li> <li><input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible</li> </ul>	1. No 2. Yes 3. Yes
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	N/A
6. Includes a School-Parent Compact (see checklist next page)	Yes
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <li><input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li> <li><input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement</li> <li><input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</li> <li><input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school</li> <li><input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand</li> <li><input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request</li> </ul>	1. Yes 2. Yes 3. No 4. Yes 5. Yes 6. Yes

## Attachment B

### Parent Involvement Policy Checklist

**School Parental Involvement Policy:** Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy <b>Central Elementary</b>	Found on Page #
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	No
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	No
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	No
4. Provide parents with: <ul style="list-style-type: none"> <li><input type="checkbox"/> Provide timely information about Title I programs</li> <li><input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet</li> <li><input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible</li> </ul>	1. No  2. No  3. No
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	N/A
6. Includes a School-Parent Compact (see checklist next page)	Yes
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <li><input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children</li> <li><input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement</li> <li><input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children</li> <li><input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school</li> <li><input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand</li> <li><input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request</li> </ul>	1. No  2. Yes  3. No  4. No  5. No  6. No

## Attachment C

### School – Parent Compact Checklist

**School-Parent Compacts:** As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include: Paul Saylor Elementary	Found on Page #
<p>1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and</p>	<p>No-Needs to describe the school's responsibility to provide high quality curriculum and instruction</p>
<p>2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement</li> <li><input type="checkbox"/> Frequent reports to parents on their children's progress</li> <li><input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities</li> </ul>	<p>1. No</p> <p>2. No</p> <p>3. No</p>

## Attachment C

### School – Parent Compact Checklist

**School-Parent Compacts:** As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State’s high standards. Such compact shall:

School-Parent Compact shall include: <b>Central Elementary</b>	<b>Found on Page #</b>
3. Describe the school’s responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State’s student academic achievement standards, and the ways in which each parent will be responsible for supporting their children’s learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child’s classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	No
4. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"> <li><input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child’s achievement</li> <li><input type="checkbox"/> Frequent reports to parents on their children’s progress</li> <li><input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child’s class, and observation of classroom activities</li> </ul>	1. No   2. No   3. No

### Attachment Topic 3

#### **NCLB School Improvement Plan Requirements. Contained within Section 1116 (b).**

“(3) SCHOOL PLAN.—

“(A) REVISED PLAN.—After the resolution of a review under paragraph (2), each school identified under paragraph (1) for school improvement shall, not later than 3 months after being so identified, develop or revise a school plan, in consultation with parents, school staff, the local educational agency serving the school, and outside experts, for approval by such local educational agency. The school plan shall cover a 2-year period and—

“(i) incorporate strategies based on scientifically based research that will strengthen the core academic subjects in the school and address the specific academic issues that caused the school to be identified for school improvement, and may include a strategy for the implementation of a comprehensive school reform model that includes each of the components described in part F;

“(ii) adopt policies and practices concerning the school's core academic subjects that have the greatest likelihood of ensuring that all groups of students specified in section 1111(b)(2)(C)(v) and enrolled in the school will meet the State's proficient level of achievement on the State academic assessment described in section 1111(b)(3) not later than 12 years after the end of the 2001–2002 school year;

“(iii) provide an assurance that the school will spend not less than 10 percent of the funds made available to the school under section 1113 for each fiscal year that the school is in school improvement status, for the purpose of providing to the school's teachers and principal high-quality professional development that—

“(I) directly addresses the academic achievement problem that caused the school to be identified for school improvement;

“(II) meets the requirements for professional development activities under section 1119; and

“(III) is provided in a manner that affords increased opportunity for participating in that professional development;

“(iv) specify how the funds described in clause (iii) will be used to remove the school from school improvement status;

“(v) establish specific annual, measurable objectives for continuous and substantial progress by each group of students specified in section 1111(b)(2)(C)(v) and enrolled in the school that will ensure that all such groups of students will, in accordance with adequate yearly progress as defined in section 1111(b)(2),



meet the State's proficient level of achievement on the State academic assessment described in section 1111(b)(3) not later than 12 years after the end of the 2001–2002 school year;

“(vi) describe how the school will provide written notice about the identification to parents of each student enrolled in such school, in a format and, to the extent practicable, in a language that the parents can understand;

“(vii) specify the responsibilities of the school, the local educational agency, and the State educational agency serving the school under the plan, including the technical assistance to be provided by the local educational agency under paragraph (4) and the local educational agency's responsibilities under section 1120A;

“(viii) include strategies to promote effective parental involvement in the school;

“(ix) incorporate, as appropriate, activities before school, after school, during the summer, and during any extension of the school year; and

“(x) incorporate a teacher mentoring program.

“(B) CONDITIONAL APPROVAL.—The local educational agency may condition approval of a school plan under this paragraph on—

“(i) inclusion of one or more of the corrective actions specified in paragraph (7)(C)(iv); or

“(ii) feedback on the school improvement plan from parents and community leaders.

“(C) PLAN IMPLEMENTATION.—Except as provided in subparagraph (D), a school shall implement the school plan (including a revised plan) expeditiously, but not later than the beginning of the next full school year following the identification under paragraph (1).

“(D) PLAN APPROVED DURING SCHOOL YEAR.—Notwithstanding subparagraph (C), if a plan is not approved prior to the beginning of a school year, such plan shall be implemented immediately upon approval.

“(E) LOCAL EDUCATIONAL AGENCY APPROVAL.—The local educational agency, within 45 days of receiving a school plan, shall—

“(i) establish a peer review process to assist with review of the school plan; and

“(ii) promptly review the school plan, work with the school as necessary, and approve the school plan if the plan meets the requirements of this paragraph.

## **Attachment Topic 10: Equitable Services to Private Schools**

### **SEC. 1120. PARTICIPATION OF CHILDREN ENROLLED IN PRIVATE SCHOOLS.**

#### **(a) GENERAL REQUIREMENT-**

(1) **IN GENERAL-** To the extent consistent with the number of eligible children identified under section 1115(b) in the school district served by a local educational agency who are enrolled in private elementary schools and secondary schools, a local educational agency shall, after timely and meaningful consultation with appropriate private school officials, provide such children, on an equitable basis, special educational services or other benefits under this part (such as dual enrollment, educational radio and television, computer equipment and materials, other technology, and mobile educational services and equipment) that address their needs, and shall ensure that teachers and families of the children participate, on an equitable basis, in services and activities developed pursuant to sections 1118 and 1119.

(2) **SECULAR, NEUTRAL, NONIDEOLOGICAL-** Such educational services or other benefits, including materials and equipment, shall be secular, neutral, and nonideological.

(3) **EQUITY-** Educational services and other benefits for such private school children shall be equitable in comparison to services and other benefits for public school children participating under this part, and shall be provided in a timely manner.

(4) **EXPENDITURES-** Expenditures for educational services and other benefits to eligible private school children shall be equal to the proportion of funds allocated to participating school attendance areas based on the number of children from low-income families who attend private schools, which the local educational agency may determine each year or every 2 years.

(5) **PROVISION OF SERVICES-** The local educational agency may provide services under this section directly or through contracts with public and private agencies, organizations, and institutions.

#### **(b) CONSULTATION-**

(1) **IN GENERAL-** To ensure timely and meaningful consultation, a local educational agency shall consult with appropriate private school officials during the design and development of such agency's programs under this part, on issues such as —

(A) how the children's needs will be identified;

(B) what services will be offered;

(C) how, where, and by whom the services will be provided;

(D) how the services will be academically assessed and how the results of that assessment will be used to improve those services;

(E) the size and scope of the equitable services to be provided to the eligible private school children, and the proportion of funds that is allocated under subsection (a)(4) for such services;

(F) the method or sources of data that are used under subsection (c) and section 1113(c)(1) to determine the number of children from low-income families in participating school attendance areas who attend private schools;

(G) how and when the agency will make decisions about the delivery of services to such children, including a thorough

consideration and analysis of the views of the private school officials on the provision of services through a contract with potential third-party providers; and  
(H) how, if the agency disagrees with the views of the private school officials on the provision of services through a contract, the local educational agency will provide in writing to such private school officials an analysis of the reasons why the local educational agency has chosen not to use a contractor.

(2) **TIMING-** Such consultation shall include meetings of agency and private school officials and shall occur before the local educational agency makes any decision that affects the opportunities of eligible private school children to participate in programs under this part. Such meetings shall continue throughout implementation and assessment of services provided under this section.

(3) **DISCUSSION-** Such consultation shall include a discussion of service delivery mechanisms a local educational agency can use to provide equitable services to eligible private school children.

(4) **DOCUMENTATION-** Each local educational agency shall maintain in the agency's records and provide to the State educational agency involved a written affirmation signed by officials of each participating private school that the consultation required by this section has occurred. If such officials do not provide such affirmation within a reasonable period of time, the local educational agency shall forward the documentation that such consultation has taken place to the State educational agency.

(5) **COMPLIANCE-**

(A) **IN GENERAL-** A private school official shall have the right to complain to the State educational agency that the local educational agency did not engage in consultation that was meaningful and timely, or did not give due consideration to the views of the private school official.

(B) **PROCEDURE-** If the private school official wishes to complain, the official shall provide the basis of the noncompliance with this section by the local educational agency to the State educational agency, and the local educational agency shall forward the appropriate documentation to the State educational agency.

(c) **ALLOCATION FOR EQUITABLE SERVICE TO PRIVATE SCHOOL STUDENTS-**

(1) **CALCULATION-** A local educational agency shall have the final authority, consistent with this section, to calculate the number of children, ages 5 through 17, who are from low-income families and attend private schools by —

(A) using the same measure of low income used to count public school children;

(B) using the results of a survey that, to the extent possible, protects the identity of families of private school students, and allowing such survey results to be extrapolated if complete actual data are unavailable;

(C) applying the low-income percentage of each participating public school attendance area, determined pursuant to this section, to the number of private school children who reside in that school attendance area; or

(D) using an equated measure of low income correlated with the measure of low income used to count public school children.

(2) COMPLAINT PROCESS- Any dispute regarding low-income data for private school students shall be subject to the complaint process authorized in section 9505.

(d) PUBLIC CONTROL OF FUNDS-

(1) IN GENERAL- The control of funds provided under this part, and title to materials, equipment, and property purchased with such funds, shall be in a public agency, and a public agency shall administer such funds, materials, equipment, and property.

(2) PROVISION OF SERVICES-

(A) PROVIDER- The provision of services under this section shall be provided —

(i) by employees of a public agency; or

(ii) through contract by such public agency with an individual, association, agency, or organization.

(B) REQUIREMENT- In the provision of such services, such employee, individual, association, agency, or organization shall be independent of such private school and of any religious organization, and such employment or contract shall be under the control and supervision of such public agency.

(e) STANDARDS FOR A BYPASS- If a local educational agency is prohibited by law from providing for the participation in programs on an equitable basis of eligible children enrolled in private elementary schools and secondary schools, or if the Secretary determines that a local educational agency has substantially failed or is unwilling, to provide for such participation, as required by this section, the Secretary shall —

(1) waive the requirements of this section for such local educational agency;

(2) arrange for the provision of services to such children through arrangements that shall be subject to the requirements of this section and sections 9503 and 9504; and

(3) in making the determination under this subsection, consider one or more factors, including the quality, size, scope, and location of the program and the opportunity of eligible children to participate

## **Attachment Topic 12**

### **Title I, Part A Supplement, Not Supplant Requirement and Other Fiscal Requirements. Section 1120A.**

#### **“SEC. 1120A. FISCAL REQUIREMENTS.**

“(a) MAINTENANCE OF EFFORT.—A local educational agency may receive funds under this part for any fiscal year only if the State educational agency involved finds that the local educational agency has maintained the agency’s fiscal effort in accordance with section 9521.

“(b) FEDERAL FUNDS TO SUPPLEMENT, NOT SUPPLANT, NONFEDERAL FUNDS.—

“(1) IN GENERAL.—A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from non-Federal sources for the education of pupils participating in programs assisted under this part, and not to supplant such funds.

“(2) SPECIAL RULE.—No local educational agency shall be required to provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency’s compliance with paragraph (1).

“(c) COMPARABILITY OF SERVICES.—

“(1) IN GENERAL.—

“(A) COMPARABLE SERVICES.—Except as provided in paragraphs (4) and (5), a local educational agency may receive funds under this part only if State and local funds will be used in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part.

“(B) SUBSTANTIALLY COMPARABLE SERVICES.—If the local educational agency is serving all of such agency’s schools under this part, such agency may receive funds under this part only if such agency will use State and local funds to provide services that, taken as a whole, are substantially comparable in each school.

“(C) BASIS.—A local educational agency may meet the requirements of subparagraphs (A) and (B) on a gradespan by grade-span basis or a school-by-school basis.

“(2) WRITTEN ASSURANCE.—

“(A) EQUIVALENCE.—A local educational agency shall be considered to have met the requirements of paragraph (1) if such agency has filed with the State educational agency a written assurance that such agency has established and implemented—

“(i) a local educational agency-wide salary schedule;

“(ii) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and

“(iii) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

“(B) DETERMINATIONS.—For the purpose of this subsection, in the determination of expenditures per pupil from State and local funds, or instructional salaries per pupil from State and local funds, staff salary differentials for years of employment shall not be included in such determinations.

“(C) EXCLUSIONS.—A local educational agency need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services under this subsection.

“(3) PROCEDURES AND RECORDS.—Each local educational agency assisted under this part shall—

“(A) develop procedures for compliance with this subsection;

and

“(B) maintain records that are updated biennially documenting such agency’s compliance with this subsection.

“(4) INAPPLICABILITY.—This subsection shall not apply to a local educational agency that does not have more than one building for each grade span.

“(5) COMPLIANCE.—For the purpose of determining compliance with paragraph (1), a local educational agency may exclude State and local funds expended for—

“(A) language instruction educational programs; and

“(B) the excess costs of providing services to children with disabilities as determined by the local educational agency.

“(d) EXCLUSION OF FUNDS.—For the purpose of complying with subsections (b) and (c), a State educational agency or local educational agency may exclude supplemental State or local funds expended in any school attendance area or school for programs that meet the intent and purposes of this part.

## **Attachment Topic 13**

### **EDGAR 80.20**

#### **Sec. 80.20 Standards for financial management systems.**

(a) A State must expand and account for grant funds in accordance with State laws and procedures for expending and accounting for its own funds. Fiscal control and accounting procedures of the State, as well as its subgrantees and cost-type contractors, must be sufficient to:

(1) Permit preparation of reports required by this part and the statutes authorizing the grant, and

(2) Permit the tracing of funds to a level of expenditures adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes.

(b) The financial management systems of other grantees and subgrantees must meet the following standards:

(1) Financial reporting. Accurate, current, and complete disclosure of the financial results of financially assisted activities must be made in accordance with the financial reporting requirements of the grant or subgrant.

(2) Accounting records. Grantees and subgrantees must maintain records which adequately identify the source and application of funds provided for financially-assisted activities. These records must contain information pertaining to grant or subgrant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income.

(3) Internal control. Effective control and accountability must be maintained for all grant and subgrant cash, real and personal property, and other assets. Grantees and subgrantees must adequately safeguard all such property and must assure that it is used solely for authorized

purposes.

(4) Budget control. Actual expenditures or outlays must be compared with budgeted amounts for each grant or subgrant. Financial information must be related to performance or productivity data, including the development of unit cost information whenever appropriate or specifically required in the grant or subgrant agreement. If unit cost data are required, estimates based on available documentation will be accepted whenever possible.

(5) Allowable cost. Applicable OMB cost principles, agency program regulations, and the terms of grant and subgrant agreements will be followed in determining the reasonableness, allowability, and allocability of costs.

(6) Source documentation. Accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contract and subgrant award documents, etc.

(7) Cash management. Procedures for minimizing the time elapsing between the transfer of funds from the U.S. Treasury and disbursement by grantees and subgrantees must be followed whenever advance payment procedures are used. Grantees must establish reasonable procedures to ensure the receipt of reports on subgrantees' cash balances and cash disbursements in sufficient time to enable them to prepare complete and accurate cash transactions reports to the awarding agency. When advances are made by letter-of-credit or electronic transfer of funds methods, the grantee must make drawdowns as close as possible to the time of making disbursements. Grantees must monitor cash drawdowns by their subgrantees to assure that they conform substantially to the same standards of timing and amount as apply to advances to the grantees.

(c) An awarding agency may review the adequacy of the financial management system of any applicant for financial assistance as part of a preaward review or at any time subsequent to award.

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